

RICHARD R. PATCH (State Bar No. 88049)  
MARK L. HEJINIAN (State Bar No. 281417)  
DANIEL M. BRUGGEBREW (State Bar No. 307037)  
EVAN CAMPBELL (State Bar No. 342223)  
COBLENTZ PATCH DUFFY & BASS LLP  
One Montgomery Street, Suite 3000  
San Francisco, California 94104-5500  
Telephone: 415.391.4800  
Facsimile: 415.989.1663  
Email: ef-rrp@cpdb.com  
ef-mlh@cpdb.com  
ef-dmb@cpdb.com  
ef-egc@cpdb.com

Attorneys for Defendants  
PRIME ASCOT, L.P.; PRIME ASCOT  
ACQUISITION, LLC; PRIME/PARK LABREA  
TITLEHOLDER, LLC; and PRIME  
ADMINISTRATION, LLC

**UNITED STATES DISTRICT COURT**

**EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION**

NICHA LEASER, ATCHARA WONGSAROJ,  
KATINA MAGEE, and JOYCE EISMAN,  
individually, and on behalf of others similarly  
situated,

Plaintiffs,

v.

PRIME ASCOT, L.P., a California limited  
partnership; PRIME ASCOT ACQUISITION,  
LLC, a Delaware limited liability company;  
PRIME/PARK LABREA TITLEHOLDER,  
LLC, a Delaware limited liability company  
(originally sued as Doe 1); PRIME  
ADMINISTRATION, LLC, a Delaware limited  
liability company; and Does 31 through 50,  
inclusive,

Defendants.

Case No. 2:20-CV-02502-DJC-AC

**AMENDED STIPULATION AND  
ORDER TO MODIFY SCHEDULING  
ORDER**

District Judge Daniel J. Calabretta  
Courtroom 10, 13th Floor

Trial Date: July 13, 2026

1 Plaintiffs NICHIA LEASER, ATCHARA WONGSAROJ, KATINA MAGEE and JOYCE  
2 EISMAN (collectively, “Plaintiffs”) and Defendants PRIME ASCOT, L.P., PRIME ASCOT  
3 ACQUISITION, LLC, PRIME/PARK LABREA TITLEHOLDER, LLC, PRIME  
4 ADMINISTRATION, LLC (collectively, “Defendants,” and together with Plaintiffs, the  
5 “Parties”), by and through their respective counsel of record, hereby stipulate as follows:

6 WHEREAS, the Court issued a scheduling order on October 21, 2024 (ECF No. 82) (the  
7 “Scheduling Order”);

8 WHEREAS, under the Scheduling Order, all fact discovery shall be completed no later  
9 than July 31, 2025;

10 WHEREAS, on April 10, 2025, Defendants served a Notice of Deposition on each  
11 Plaintiff, scheduling the depositions of Leaser for May 28, 2025, of Wongsaroj for May 30, 2025,  
12 of Magee for June 3, 2025, and of Eisman for June 5, 2025 (the “Plaintiff Deponents”);

13 WHEREAS, on July 2, 2025, Plaintiffs offered the following dates for the Plaintiffs  
14 Deponents’ depositions: July 22, July 25, July 28, July 29, July 30, and August 1, 2025;

15 WHEREAS, on July 2, 2025, Plaintiffs served a Notice of Deposition of Defendant Prime  
16 Administration, LLC’s 30(b)(6) Designation, scheduling the deposition for July 21, 2025;

17 WHEREAS, on July 2, 2025, Plaintiffs inquired about potential deposition dates for Jamie  
18 Madden, Jason Ursua, Lizza Castro, and Michael Denham (together with the Plaintiff Deponents  
19 and Defendant Prime Administration, LLC, the “Parties’ Deponents”);

20 WHEREAS, the Parties are engaged in meaningful settlement discussions and seek to  
21 suspend certain deadlines set forth in the Scheduling Order to allow the Parties additional time to  
22 explore settlement; and

23 WHEREAS, in the event the Parties cannot reach settlement, the Parties reserve all rights  
24 regarding the potential depositions of the Parties’ Deponents identified above.

25 NOW THEREFORE, subject to the Court’s approval:

26 1. The dates and deadlines in the Scheduling Order shall be modified as follows:  
27  
28

Fact Discovery Cutoff Date:	9/30/2025;
Expert Disclosure Deadline:	12/1/2025;
Supplemental Disclosure Deadline:	2/16/2026;
Expert Discovery Cutoff Date:	3/20/2026;
Motion for Class Certification Deadline:	9/24/2025;
Class Certification Motion Hearing:	11/6/2025 at 1:30 PM;
Dispositive Motion Filing Deadline:	5/15/2026;
Dispositive Motion Hearing:	7/9/2026 at 1:30 PM;
Final Pretrial Conference:	9/24/2026 at 1:30 PM; and
Jury/Bench Trial	11/9/2026 at 8:30 AM.

2. All other terms and deadlines not expressly addressed in this Stipulation remain in effect.

3. Notwithstanding the extension of the fact discovery cut-off date, the parties agree that they shall not propound additional written discovery and shall not seek the depositions of any witnesses other than the Parties' Deponents referenced herein absent a showing of good cause.

**IT IS SO STIPULATED.**

DATED: July 22, 2025

NICHOLAS & TOMASEVIC, LLP

By: /s/ Alex Tomasevic  
 ALEX TOMASEVIC  
 Attorneys for Plaintiffs  
 NICHIA LEASER, ATCHARA WONGSAROJ,  
 KATINA MAGEE and JOYCE EISMAN

1 DATED: July 22, 2025

COBLENTZ PATCH DUFFY & BASS LLP

2  
3 By: /s/ Mark L. Hejinian

4 MARK L. HEJINIAN

5 Attorneys for Defendants

PRIME ASCOT, L.P.; PRIME ASCOT

6 ACQUISITION, LLC; PRIME/PARK LABREA

7 TITLEHOLDER, LLC; PRIME

ADMINISTRATION, LLC

8 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

9  
10 Dated: July 22, 2025

/s/ Daniel J. Calabretta

11 THE HONORABLE DANIEL J. CALABRETTA

12 UNITED STATES DISTRICT JUDGE